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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MICHAEL J. FLYNN, and PHILIP  
STILLMAN,

Plaintiffs,

v.

MICHAEL E. LOVE, an individual;  
JACQUELYNE LOVE, an individual;  
MICHAEL E. LOVE as TRUSTEE OF THE  
MICHAEL LOVE FAMILY TRUST;  
MELECO, INC., a Nevada corporation; and  
DOES 1-10

Defendants.

Case No.: 3:19-cv-239-MMD-CLB

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME FOR DEFENDANTS  
TO FILE THEIR REPLY IN SUPPORT OF  
THEIR MOTION TO DISMISS [ECF 67]**

***First Request***

Plaintiffs Michael J. Flynn and Philip Stillman (“Plaintiffs”), appearing *pro se*, and Defendants Michael Love, individually and as trustee of the Michael Love Family Trust, Jacquelyne Love, and Meleco, Inc. (collectively, “Defendants”) by and through their attorneys of record, the law firm Greenberg Traurig, LLP, hereby stipulate and request that the Court extend the

deadline by which Defendants must file their Reply in support of their Motion to Dismiss (ECF No. 67) by one week, making the deadline **September 8, 2020**. This stipulation is made and based upon the following.

1. Defendants filed their Motion to Dismiss portions of Plaintiffs' Third Amended Complaint on August 3, 2020. ECF No. 67.

2. The parties stipulated that Plaintiffs Opposition in response would be due August 25, 2020.

3. Defendants request an extension of one week by which to file their Reply in support.

4. Plaintiffs have no objection to this short extension, and so stipulate that Defendants shall have until **September 8, 2020** by which to file their Reply in support of their Motion to Dismiss.

5. This is the first request for an extension of time to file the Reply, and it is made in good faith and not for purposes of delay.

DATED this 31<sup>st</sup> day of August 2020.

DATED this 31<sup>st</sup> day of August 2020.

**GREENBERG TRAUIG, LLP**

/s/ Michael Flynn

/s/ Jason Hicks

MICHAEL J. FLYNN, ESQ.

MARK E. FERRARIO

*Appearing Pro Se*

Nevada Bar No. 1625

PHILIP STILLMAN, ESQ.

JASON K. HICKS, ESQ.

*Appearing Pro Se*

Nevada Bar No. 13149

*Plaintiffs*

VINCENT H. CHIEFFO

*Admitted Pro Hac Vice*

*Attorneys for Defendants*

**IT IS SO ORDERED**



UNITED STATES DISTRICT JUDGE

Dated this 31<sup>st</sup> day of August 2020.